

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

DEVIN G. NUNES,

Plaintiff,

vs.

CABLE NEWS NETWORK, INC.,

Defendant.

Civil No.: 3:19-CV-00889

CONSENT MOTION TO EXTEND DEADLINE TO RESPOND

Defendant Cable News Network, Inc. (“CNN”) hereby moves the Court to extend its deadline to answer or otherwise respond to Plaintiff’s Complaint (Dkt. No. 1) to January 17, 2020. Plaintiff consents to this request.

In support of this motion, CNN states as follows:

1. On December 3, 2019, Plaintiff filed his Complaint, which was served on CNN on December 5, 2019. CNN’s responsive pleading is currently due December 26, 2019.
2. This extension is requested in good faith. Undersigned counsel need additional time to investigate the allegations in the Complaint and prepare a response. The response is currently due over the holidays (the day after Christmas), when counsel and client personnel have travel and family plans that will make it more difficult to coordinate with each other and prepare an appropriate response.
3. Counsel for CNN have conferred with counsel for the Plaintiff, Steven S. Biss, who consents to this extension.

WHEREFORE, CNN respectfully requests that the Court enter an order extending CNN's time to file a responsive pleading until January 17, 2020.

Dated: December 18, 2019

Respectfully submitted,

WILLIAMS & CONNOLLY LLP

By: /s/ Dane H. Butswinkas

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CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of December 2019, I caused a true and correct copy of the foregoing Consent Motion to Extend Deadline to Respond to be served on counsel of record via the Court's CM/ECF system.

/s/ Dane H. Butswinkas

Dane H. Butswinkas